

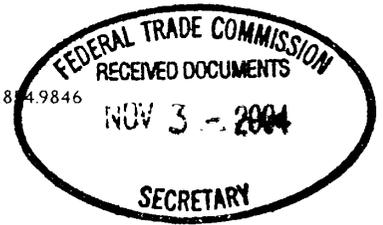


KINECTA[™]
FEDERAL CREDIT UNION

ADMINISTRATIVE OFFICES

1440 Rosecrans Avenue, Manhattan Beach, CA 90266 TEL 310.643.5400 TEL 800.844.9846

www.kinecta.org • info@kinecta.org



October 28, 2004

Federal Trade Commission
FACTA Prescreen Rule
Post Office Box 1030
Merrifield, VA 22116-1030

Re: Opt-Out Disclosures Relating to Prescreened Offers for Credit or Insurance.
FACTA Prescreen Rule - Project No. R411010

Dear Sir or Madam:

Thank you for the opportunity to comment on the above-referenced proposed rule. Generally, Kinecta Federal Credit Union believes that the proposed requirements for format and manner of the subject disclosures seem appropriate and adequate to fulfill the purpose of enabling consumers to understand their right to opt-out of receiving prescreened offers.

In our opinion, the proposed layered notices provide a simple and easy format for disclosing the required information by allowing consumers to obtain the basic information on the short notice and more detailed information, should they ever need it, on the long notice. All the terms used in the model notices are likely to be understood by ordinary consumers and adequately provide them with the information necessary to exercise their right to opt-out.

In addition, the Credit Union believes that the requirement that the short notice be "on the first page of the principal promotional document in the solicitation" would be sufficient to ensure that the short notice is prominent and noticeable. However, we would encourage that the term "principal promotional document" be defined under the rule in order to help eliminate any confusion on which document the disclosure should appear.

With regards to the long notice, we strongly believe that institutions should be allowed to include in the notice any information that a consumer may find beneficial. Additionally, we agree with the flexibility of providing short and long notices on separate documents as long as the consumer is notified about where to find the long notice.

Finally, the effective date of the proposed rule seems adequate and appropriate.

Again, we appreciate the opportunity to comment on this important proposed rule. If you wish additional details or information, please feel free to contact me at (310) 643-5597.

Sincerely,

Kathryn Davis

Vice President, Marketing